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October 16, 2000

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Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B-204
Washington, DC 20554

Re: CC Docket No. 00-176, Application by Verizon Communications for Authorization under Section 271 to Provide Long Distance Service in Massachusetts

Dear Ms. Salas:

The Rainbow/PUSH Coalition welcomes the opportunity to submit comments in support of Verizon's filing requesting the Federal Communications Commission's authorization to provide in-region, interLATA services in Massachusetts. The Rainbow/PUSH Coalition is a multi-racial international organization that promotes social, racial and economic justice on behalf of citizens who are disenfranchised politically, socially and economically, in particular, the poor, working poor and those on fixed incomes.

The Rainbow/PUSH Coalition believes that Verizon's entry into the long distance market in the state of Massachusetts will open the marketplace to true local, long distance and data services competition benefiting consumers and businesses alike.

The Telecommunications Act of 1996 was intended to promote choice and competition in the telecommunications industry. Verizon's entry into the long distance market in Massachusetts will be another positive step in that direction for the following reasons:

- Local and long-distance competition will be spurred by Verizon's entry into that market;
- Consumers in New York have begun to obtain products and services not available in neighboring states as a result of Verizon's participation in the long distance market;
- There is clear evidence that when Verizon entered the long-distance market in New York, AT&T, MCI WorldCom, and Sprint lowered their rates through bundling and special promotions.

Actual experience in New York provides a strong indication that Verizon's entry in Massachusetts will produce enormous benefits and will further promote local, as well as

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long distance competition. In fact, AT&T and MCI WorldCom now have approximately one million mass-market local customers in New York, all in addition to the hundreds of thousands of business customers served by each over its own facilities. Verizon's entry also has allowed it to introduce simpler and less expensive long-distance services tailored to benefit the mass-market customers that have traditionally been abandoned or ignored.

Low volume users have benefited from Verizon's introduction of "no minimum" plans. Members of the immigrant community in New York are benefiting from Verizon's introduction new services that allow consumers to charge their phone bills to a credit card or pre-pay for their lower per-minute long distance services to places like the Caribbean.

Competition lowers prices. With Verizon in the Massachusetts long distance market, services and products will be provided at more affordable prices. Indeed, a recently released consumer report estimates that New York customers could save \$120 million a year by subscribing to Verizon compared to the prices currently offered AT&T, MCI WorldCom and Sprint.¹ Our review of the Verizon's application indicates that Verizon will carry-over the same innovations and thus, cost savings to consumers in Massachusetts.

In summary, the Rainbow/PUSH Coalition believes that Verizon's entry into the long-distance market in Massachusetts is in the "public interest." Verizon's entry opens the marketplace to true local, long-distance and data services competition. Consumers will have multiple choices for these services. As in New York, other competitors in Massachusetts will accelerate their efforts to compete in the local market and to meet the challenges presented by a new major competitor for telecommunications services.

The Rainbow/PUSH Coalition urges the Federal Communications Commission to favorably and expeditiously review and approve Verizon's Section 271 application. Rapid deployment of a fully competitive marketplace will ensure that consumers in Massachusetts and across the nation will have affordable and full access to advanced telecommunications products and services.

Respectfully submitted,

A handwritten signature in cursive script, reading "Jesse Jackson", written in dark ink.

Rev. Jesse L. Jackson, Sr.
President & Founder

¹ Telecommunications Research and Action Center, September 2000.